Exhibit 4

Case 1:19-md-02875-RMB-SAK

Document 316-4 4903

Filed 12/10/19

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December 8, 2019

HO CHI MINH CITY

VIA EMAIL TO VALPEC@KIRTLANDPACKARD.COM

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Re: In re Valsartan Products Liability Litigation, Civ. No. 19-md-2875 (D.N.J.)

Xunqiao Organizational Charts

Counsel:

It was our understanding that the parties' recent agreement to each bear their own translation costs applied to the organizational charts. In light of Plaintiffs' recent request that the Court order ZHP to translate the organizational charts related to the Xunqiao finished dose facility, enclosed please find English versions of the charts previously produced as ZHP00000009–ZHP00000012. In producing these documents, ZHP expressly reserves all objections to discoverability and admissibility, as well as all defenses, jurisdictional or otherwise. In addition, ZHP's agreement to produce this limited set of documents as a courtesy to Plaintiffs should not be interpreted as an agreement to translate any other documents in this matter.

Sincerely,

/s/ Alexandra Waleko

Alexandra Waleko

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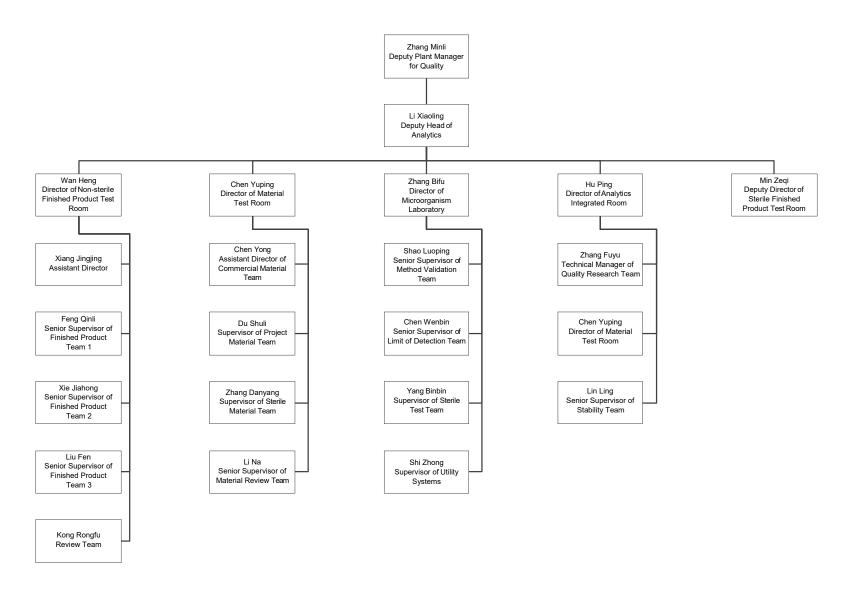
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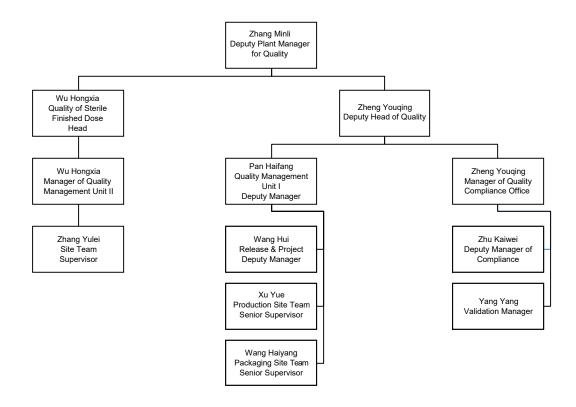
Organization Chart of Zhejiang Huahai Pharmaceutical Co., Ltd. Finished Dose Plant Analytics Center (November 2019)

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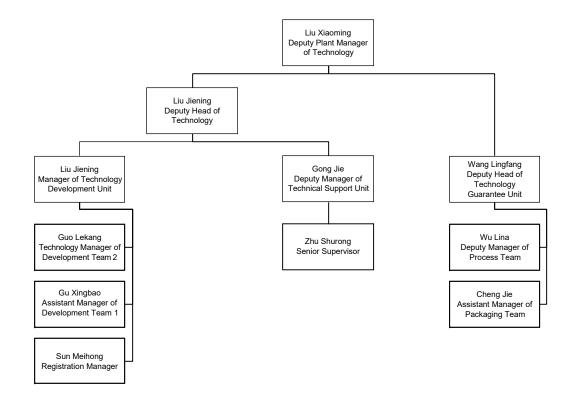


Organization Chart of Zhejiang Huahai Pharmaceutical Co., Ltd. Finished Dose Plant Quality Management Department (November 2019)





Organization Chart of Zhejiang Huahai Pharmaceutical Co., Ltd. Finished Dose Plant Technology Center (November 2019)



Organization Chart of Zhejiang Huahai Pharmaceutical Co., Ltd. Finished Dose Non-sterile Production Division (November 2019)

